

JUDGE DAVID BRIONES

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

2012 SEP -5 PM 2:35

JP

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCO ANTONIO DELGADO,

Defendant.

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S E A L E D

CRIMINAL NO. EP-12-CR- _____

I N D I C T M E N T

CT 1: 18 U.S.C. § 1956(h);
[Conspiracy to Commit Money
Laundering.]

EP12CR2106

THE GRAND JURY CHARGES THAT:

COUNT ONE

(18 U.S.C. § 1956(h))

From on or about July 2007, and through December 2008, in
the Western District of Texas and elsewhere, Defendant,

MARCO ANTONIO DELGADO,

did knowingly combine, conspire, and agree with other persons
known and unknown to the Grand Jury to commit offenses against
the United States, in violation of Title 18, United States Code,
Section 1956, to-wit:

- (A) to knowingly conduct and attempt to conduct a financial
transaction affecting interstate commerce and foreign
commerce, which transaction involved the proceeds of
specified unlawful activity, that is, Conspiracy to
Possess with the Intent to Distribute a Controlled
Substance, in violation of Title 21, United States Code,

Section 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and

- (B) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 846, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of

Title 18, United States Code, Section 1956(a)(2)(B)(i);
and

(C) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 846, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission and transfer was designed in whole or in part to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL.
ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN
UNITED STATES ATTORNEY

BY:


Juanita Fielden
Assistant U.S. Attorney